

U.S. Department of Justice

United States Attorney Eastern District of New York

AAS:JN F. #2017R05903 271 Cadman Plaza East Brooklyn, New York 11201

August 12, 2019

By Hand and ECF

The Honorable Ann M. Donnelly United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-2) (AMD)

Dear Judge Donnelly:

The government respectfully requests that it be permitted to file a reply on or before Friday, August 23, 2019 to the defendant's opposition to the government's application to treat previously produced discovery as Sensitive Discovery Material. The government filed its application on August 1, 2019, and the defendants filed a response in opposition on Friday, August 9, 2019. In its initial application the government requested leave of the Court to file a reply. The government now renews its request to file a reply brief and requests two

weeks until August 23, 2019 to do so due to travel schedules. If the Court grants the government's request, the defendants consent to the August 23, 2019 deadline.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Julia Nestor

Alexander A. Solomon

Julia Nestor

David K. Kessler

Kaitlin T. Farrell

Sarah M. Evans

Assistant U.S. Attorneys

(718) 254-7000

DEBORAH L. CONNOR

Chief

Money Laundering and Asset Recovery Section Criminal Division, U.S. Department of Justice

Laura M. Billings Christian J. Nauvel Trial Attorneys

JAY I. BRATT

Chief

Counterintelligence and Export Control Section National Security Division, U.S. Department of Justice

Thea D. R. Kendler David Lim Trial Attorneys

cc: Clerk of the Court (by ECF)
Defense Counsel (by ECF)